

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

AKARI JOHNSON and
HAZEL THOMPSON,

Plaintiffs,

CASE NO.: 4:24-cv-10017-JEM

v.

MMI 82, LLC and
THE ENTHUSIAST LLC,

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE A
REPLY IN SUPPORT OF PLAINTIFFS' MOTION FOR SANCTIONS**

Plaintiffs, Akari Johnson and Hazel Thompson, by and through their undersigned counsel, respectfully request a ten (10) day extension of time, through and including July 11, 2025, to file their reply to Defendant's Response to Plaintiffs' Motion for Sanctions [D.E. 51], and in support state as follows:

1. Plaintiffs filed their Motion for Sanctions Based on the Defendants' Spoliation of Evidence ("Motion") on May 27, 2025 [D.E. 44].
2. Defendants filed their Response to Plaintiffs' Motion for Sanctions ("Response") on June 24, 2025.
3. Plaintiffs' reply to Defendant's Response is currently due on or before July 1, 2025.
4. Good cause exists to grant Plaintiffs' request for an extension of time because they would be prejudiced absent the extension of time.
5. Plaintiffs' counsel has ordered both the transcripts of Daniella Rodriguez's and Aileen Gonzalez's depositions, which is key testimony for this matter. The court reporting agency

has informed Plaintiffs' counsel that the transcripts will not be sent until the week of June 30, 2025.

6. Accordingly, Plaintiffs' counsel requests a ten (10) day extension of time through and including July 11, 2025, to reply to Defendant's Response.

7. This motion is made in good faith and not for purposes of delay.

8. This ten (10) day extension will not interfere with any other deadline in this matter.

9. Plaintiffs' counsel has conferred with counsel for Defendants, who indicated that they do not oppose the relief sought.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter an Order granting this Motion, extending the deadline for Plaintiffs to reply to Defendants' Response by ten (10) days, through and including July 11, 2025. A proposed order granting this relief is attached as **Exhibit A** for the Court's consideration.

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7.1(a)(3), I hereby certify that counsel for all parties have conferred in on the issue raised by this motion, and Defendants' counsel advised that they do not oppose the relief sought herein.

Dated: Miami, Florida
June 25, 2025,

DEREK SMITH LAW GROUP, PLLC
Counsel for Plaintiffs

/s/ Daniel J. Barroukh
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served on June 25, 2025, on all counsel of record on the service list below via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Daniel J. Barroukh
Daniel J. Barroukh, Esq.

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